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\*Attorney for Plaintiff Bryan Holtzclaw

10 UNITED STATES DISTRICT COURT  
11 DISTRICT OF NEVADA

12 Bryan Holtzclaw,

13 Plaintiff,

14 v.

15 Romeo Aranas in his individual capacity;  
16 Gregory Bryan in his individual capacity;  
17 Bob Faulkner in his individual capacity;  
18 Monique Hubbard-Pickett in her  
19 individual capacity; Georges-Pele Taino in  
his individual capacity; Nonilon Peret in  
her individual capacity; Gregory Martin in  
his individual capacity; Michael Minev in  
his individual capacity

20 Defendants.  
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Case No. 2:19-cv-00041-RFB-NJK

**Stipulation and Order Allowing  
Plaintiff to File Second Amended  
Complaint**

Mr. Holtzclaw filed his First Amended Complaint on April 21, 2021. ECF No. 78. After appointing counsel, ECF No. 124, the Court issued a scheduling order expressing that he shall file a motion to amend the complaint, or an amended complaint by stipulation of the parties, by August 23, 2023. ECF No. 131 at 2.

Under Rule 15(a)(2) of the Federal Rules of Civil Procedure, which governs other amendments, “a party may amend its pleadings only with the opposing party’s written consent or the court’s leave. The court should freely give leave when justice so requires.” This rule “should be interpreted with ‘extreme liberality.’” *Jackson v. Bank of Hawaii*, 902 F.2d 1385, 1387 (9th Cir. 1990) (quoting *United States v. Webb*, 655 F.2d 977, 979 (9th Cir. 1981)).

Here, allowing amendment is appropriate given the procedural posture of the case and other factors. *See, e.g., King v. Ryan*, No. CV-16-00259-TUC-RM, 2019 WL 6170369, at \*1-2 (D. Ariz. Nov. 20, 2019). Accordingly, it is hereby stipulated between Plaintiff and Defendants, by and through their respective counsel, that Mr. Holtzclaw should be granted leave to amend to file his Second Amended Complaint, which is attached as **Exhibit A** to this Motion.

Respectfully submitted August 23, 2023,

/s/ Douglas R. Rands  
Douglas R. Rands  
Senior Deputy Attorney General  
Attorney for Defendants

Rene L. Valladares  
Federal Public Defender  
/s/ Kimberly Sandberg  
Kimberly Sandberg  
Assistant Federal Public Defender

IT IS SO ORDERED:

  
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United States District Judge

Dated: August 24, 2023